

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS CRUM TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T28-17-18)

The United States Postal Service hereby provides responses of witness Crum to the following interrogatories of United Parcel Service: UPS/USPS-T28-17-18, filed on August 15, 1997.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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August 29, 1997



U.S. POSTAL SERVICE WITNESS CHARLES L. CRUM  
RESPONSE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE

**UPS/USPS-T28-17.** Referring to the attached chart, please provide the average number of pieces per container of Parcel Post for each container used in calculating the Postal Service's acceptance and mail processing costs and savings in Docket No. R97-1.

**RESPONSE**

The average number of Parcel Post pieces per container is not relevant to the calculation of acceptance costs and savings. The information you request for mail processing is attached.



**UPS/USPS-T28-18.** Referring to the attached chart, please provide the average number of pieces per container of Parcel Post for each container used by the Postal Service.

**RESPONSE**

The actual average number of pieces per container of Parcel Post for each container used by the Postal Service is not available.



**Average Number of Pieces of Parcel Post**

	<u>Downstream to SCFs and Delivery Units</u>		<u>DSCF Drop Ship</u>		<u>DDU Drop Ship</u>		<u>MLr. OBMC Entry</u>	
<u>Containers</u>	<u>Machinable</u>	<u>Non- Machinable</u>	<u>Machinable</u>	<u>Non- Machinable</u>	<u>Machinable</u>	<u>Non- Machinable</u>	<u>Machinable</u>	<u>Non- Machinable</u>
(a) Sack	5.8	n/a	10	n/a	n/a	n/a	n/a	n/a
(b) Pallet	n/a	22.3	n/a	n/a	n/a	n/a	n/a	26.3
(c) OTR - loose	78.4	30.8	n/a	n/a	n/a	n/a	n/a	n/a
(c) OTR - sacked	93.0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
(d) "Gaylord"	n/a	n/a	n/a	n/a	n/a	n/a	104.5	n/a
(e) GPMC	n/a	n/a	n/a	25	n/a	n/a	n/a	n/a
(f) IHC	39.2	23.3	n/a	n/a	n/a	n/a	n/a	n/a
(g) OWC	33.3	13.1	n/a	n/a	n/a	n/a	n/a	n/a



# DECLARATION

I, Charles L. Crum, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Charles L. Crum

Dated: 29 AUGUST 1997



## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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